

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

SCOTT SEDORE #210661,

Plaintiff,

v

SIRENNA LANDFAIR, *et al.*,

Defendants.

NO. 2:22-cv-10060

HON. GERSHWIN A. DRAIN

MAG. JUDGE KIMBERLY G.
ALTMAN

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MDOC DEFENDANTS' REQUESTED VOIR DIRE

MDOC Defendants request that the following voir dire questions
be asked of prospective jurors:

1. Have each juror stand and tell the Court:

- a. Name.
 - b. Marital status.
 - c. Community in which you reside.
 - d. Community in which you grew up.
 - e. Present occupation and name of employer.
 - f. If retired, former employer.
 - g. Spouse's occupation and employer.
 - h. Ages of children, if any.
 - i. Education.
 - j. Membership in civic or political clubs or organizations.
 - k. News sources you regularly utilize.
2. Have any of you ever sat on a jury before?
- a. If the answer is yes, state the court and type of case,
whether or not it went to verdict. How long ago was this?
 - b. Would this experience in any way affect your ability to
render a fair and impartial verdict in this case?

3. Have you or a member of your family ever been a party to a lawsuit either as a Plaintiff or Defendant? If the answer is yes, please state the date, type of case.
 - a. Would this experience effect your ability to render a verdict in this case?
4. The Defendants in this case are employees of the Michigan Department of Corrections (MDOC). Do any of you harbor ill feelings toward the Michigan Department of Corrections or any of its employees?
 - a. If the answer to this question is yes, please explain why you harbor those feelings?
5. Do any of you harbor ill feeling toward law enforcement officers generally? If the answer to this question is yes, please explain why you harbor those feelings?
6. Do any of you hold any opinions about law enforcement personnel that would prevent you from fairly considering and deciding this case solely on the evidence?

7. The MDOC Defendants in this case are represented by the Michigan Department of Attorney General. Do any of you harbor ill feelings toward the Michigan Department of Attorney General, and/or State of Michigan employees in general?
 - a. If the answer to this question is yes, please explain why you harbor those feelings?
8. Have you, any member of your family, or a close friend, ever been convicted of a felony?
9. Have you, or any member of your family, or a close friend, ever been confined in a jail, prison, or similar facility?
10. Have any of you ever visited or toured a jail, prison, or similar facility? If yes, would your prior visit to a correctional facility cause you to hold any sort of bias in deciding the case at hand?
11. This case involves an allegation that MDOC employees' actions harmed the Plaintiff. Does anyone have any preconceived notions about MDOC employees and their

treatment of prisoners that would cause you to not be able to fairly consider the evidence in this case?

12. The plaintiff in this case is a prisoner. Does anyone have any issue with the fact that prisoners are subject to very strict rules, and therefore, lose some of the daily freedoms of choice and comforts we may all take for granted?
13. Do any of you hold any opinions about courts or lawyers that would prevent you from fairly considering and deciding this case solely on the evidence?
14. Your function as jurors is to decide questions of fact; when it comes to the law, however, you are to take your instructions from Judge Drain, and you are bound by the instructions that Judge Drain gives you. You cannot substitute your notions for what you think the law is or should be, even if you disagree with what you are told the law is.
 - a. Do any of you not understand this?
 - b. Do any of you think you will have any trouble with this principle?

15. Plaintiff claims that the MDOC Defendants violated a provision of the United States Constitution as well as Acts passed by Congress, specifically the First Amendment, the Americans with Disabilities Act, and the Rehabilitation Act. Will each of you follow the Court's instructions regarding what Plaintiff is required to prove in order to establish a violation?
16. In this case, you will first hear from the Plaintiff. Later you will hear from the Defendants who will give you their side of the case. Will each of you keep an open mind and postpone reaching a final decision in this case until you have heard both sides?
17. Without hearing any evidence, do any of you believe that just because the Plaintiff filed a lawsuit, the Defendants must have done something wrong?
18. It is Plaintiff's burden to prove his claims against Defendants. Are each of you willing to hold Plaintiff to his burden of proof in this case?

19. Is there any circumstance in your personal life which will prevent you from giving your full attention to this case?

Respectfully submitted,

/s/O.G. Reasons

O.G. Reasons (P80463)

Assistant Attorney General

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& MDOC

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Dated: March 13, 2025

CERTIFICATE OF SERVICE

I hereby certify that on March 13, 2025, I electronically filed the above document with the Clerk of the Court using the ECF system which will send notification of such filing to counsel.

/s/ O.G. Reasons

O.G. Reasons (P80463)

Assistant Attorney General

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& MDOC